

AMON, CH.J.

ORENSTEIN, M.J.

JMK:MEB
F. #2015R00982

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

PETER M. FERRELL,

Defendant.

-----X

INDICTMENT

CR 15

331

Ch. No. _____
(T. 18, U.S.C., §§ 2252(a)(2),
2252(a)(4)(B), 2252(b)(1), 2252(b)(2),
2253 and 3551 et seq.;
T. 21, U.S.C., § 853(p))

THE GRAND JURY CHARGES:

COUNT ONE

(Receipt of Child Pornography)

1. On or about February 19, 2015, within the Eastern District of New York, the defendant PETER M. FERRELL did knowingly and intentionally receive one or more visual depictions, to wit, the image depicted in the following computer file: Valeriya_K_03.avi, using a means and facility of interstate and foreign commerce, and which visual depictions had been mailed, and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

COUNT TWO
(Possession of Child Pornography)

2. On or about June 11, 2015, within the Eastern District of New York, the defendant PETER M. FERRELL did knowingly and intentionally possess matter containing one or more visual depictions, to wit: videos and images on a Western Digital external hard drive S/N WX11A64AH76R, which visual depictions had been mailed, and shipped and transported in and affecting interstate and foreign commerce and using a means and facility of interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATIONS AS TO COUNTS ONE AND TWO

3. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253, of: (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses of conviction; and (c) any property, real or

personal, used or intended to be used to commit or to promote the commission of the offenses of conviction, or any property traceable to such property, including, but not limited to:

- a. One (1) Western Digital external hard drive S/N WX11A64AH76R;
- b. One (1) Crucial USB Thumb Drive;
- c. One (1) Sandisk USB Thumb Drive;
- d. One (1) Samsung Laptop;
- e. One (1) Silver MacBook; and
- f. One (1) Buffalo External Hard Drive S/N 6557675109866


all seized from the defendant's room in Brooklyn, New York on or about June 11, 2015.


4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2253; Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON


KELLY T. CURRIE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

JUL 08 2015

F. #2015R00982
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.


PETER M. FERRELL,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), 2253
and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.


Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Mark E. Bini, Assistant U.S. Attorney (718) 254-8761